

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
)
Plaintiffs and)
Counterdefendants,)
)
)
v.) C.A. No. 20-613 (SB)
)
)
ROSS INTELLIGENCE INC.,)
)
)
Defendant and)
Counterclaimant.)

**STIPULATION AND [PROPOSED] ORDER TO
TAKE DEPOSITION AFTER CLOSE OF FACT DISCOVERY**

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the depositions of Andrew Arruda, Charles von Simson, and Mike Dahn in his individual capacity and as a 30(b)(6) representative will be taken on the following dates:

- Charles von Simson – May 17, 2023
- Andrew Arruda – May 19, 2023
- Mike Dahn – May 23, 2023
- West Publishing & Thomson Reuters 30(b)(6) – May 23, 2023

The reason for taking these depositions after the May 11, 2023 close of fact discovery is to accommodate both the witness's and the Parties' availability.

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IT IS SO ORDERED this ____ day of May, 2023.

UNITED STATES DISTRICT JUDGE

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